

**San Miguel County Weed Control Program**  
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Mr. Brian Amme, Vegetation EIS Project Manager  
Bureau of Land Management  
P.O. Box 12000  
Reno, NV 89520-0006

See RMC-0005

January 5, 2006

Dear Mr. Amme:

I would like to submit comments on the Draft BLM Vegetation Treatments Using Herbicides Programmatic EIS. As the County Weed Manager for San Miguel County in rural southwest Colorado I have a long standing relationship with the Bureau of Land Management offices that control lands within my county and I feel I bring a unique and important view to this discussion.

I strongly support alternative B and feel that the other alternatives, with their limitation of options, are inappropriate and will lead to further degradation of our public lands through the spread of invasive plants and the associated damage to native and desirable plant populations and the many species dependent on them.

Although I do acknowledge that herbicides are pesticides and must be used properly by well trained applicators I believe that such use, when in full compliance with the label, can be an environmentally safe control measure. I would suggest that the BLM use professional applicators certified by applicable state or federal agencies for herbicide applications and that BLM personnel be assigned primary duties in weed management rather than weed management as an ancillary duty. Public health concerns and potential for environmental damage can be mitigated through planning, appropriate choice of herbicides and proper application by well trained applicators.

Alternative A would have BLM weed control efforts remaining static and in my opinion, inadequate. This is shortsighted and inappropriate as the problem will continue to grow and must be dealt with in a timely manner. BLM must expand treatment if we are to slow the rapid spread of noxious weeds on the 262 million acres it controls.

I support Alternative B which expands herbicide use, increases acres of control and allows for the use of new herbicides. Weed managers at all levels need to be able to select from the best tools in their weed management toolbox. As new chemistry is marketed for weed control, it is imperative that BLM be able to use that technology as soon as possible, particularly when a new product targets a species that is difficult to control or new to the

area. Alternative B leaves all application methods available including aerial application (addressed under alternative D).

Alternative C does not allow for the use of herbicides. This would not allow managers full use of all available tools for the control of noxious weeds- limiting control efforts to biological, cultural and mechanical controls would result in vast increases in noxious weeds and is an inappropriate alternative. In many situations there are no viable, effective alternatives to the use of herbicides- as much as we all wish there were.

Alternative D bans aerial application of herbicides but is otherwise the same as alternative B- the preferred alternative- including access to new ingredients. Aerial application is appropriate for remote and isolated locations- particularly in areas where vehicle access is impossible or difficult. Aerial application can reduce the impact of foot and equipment traffic, protecting soil crusts from deterioration while stopping the spread of noxious weeds into new areas. It is also a cost effective and efficient alternative to ground application on large areas.

Potential problems with aerial application include off target damage and risks to human health. Such potential problems can be mitigated by assuring that the application is according to the label and is performed by competent applicators with guidelines and site specific management plans established in advance of the application. It is a valuable tool that should be available as long as used properly.

Alternative E disallows the use of sulfonylurea herbicides including imazapic- again removing an effective tool from the arsenal and is not favored by San Miguel County.

Thank you for considering my comments. Please do not hesitate to contact me at the above address if any further comment or assistance is desired.

Sincerely,

A handwritten signature in cursive script, reading "Sheila Grother".

Sheila Grother

San Miguel County Weed Control Program Manager